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F. Matthews
B. Fay

Waste Disposal from Chlorophenol and Santophen Decomissioning and Dismantling

TO Dick Sinise
Andy Quick

In the shutdown of our Chlorophenol and Santophen operations, we will generate several waste streams that will require proper disposal. I would like your input relative to the following plan for disposition of these waste streams.

Santophen Decomissioning

These streams will be small quantities of the existing Santophen streams including intermediates. They might also include some isopropyl alcohol from residual solution storage tanks. This is the only compound that would not be present in our current Santophen residue. We propose treating all these streams as Santophen residue and incinerating under our existing Rollins contract. Quantity is estimated at less than one tank trailer.

Chlorophenol Decomissioning

The majority of the Chlorophenol residual material we should be able to mix and sell as OCP Crude Fractions to our existing customers. Any further residual material we will blend with the Santophen extracted residue from the acidifier and incinerate under our existing Rollins contract.

Chlorophenol Still Residue

The still residue including a fuel oil flush of both the still pot and storage tank will be incinerated under the soon to be finalized contract with Rollins Deerpark. We will use the same terms and transportation arrangements planned for the current residue.

[redacted]

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Santophen Decontamination

Our current plans call for hot caustic wash followed by cold rinses for all tne process equipment. Washings will continue until we reach some yet to be defined chlorophenol level in the wash water. The wasnes will be sewered per current practice. During this period, we will be monitoring sewer discharges daily for chlorophenols to avoid permit excursions at the waste treatment plant.

Chlorophenol Decontamination

Our plans again call for hot caustic washes followed by cold rinses until our residual chlorophenol level in the wash drops below our target. Wash water will be treated in the acidifier to remove phenolics unless the water analysis shows the phenolic level below the normal acidifier water discharge level. In this case, the water will be directly sewered. Daily sewer phenolic monitoring should avoid permit excursions at the waste treatment plant. Water used to wash the still pot and residue still will be treated regardless of phenolic level.

In addition, we will need disposal locations for the tank and pipe insulation and for the contaminated dirt and concrete that we remove. We will be getting core samples in March to better quantify the amount of dirt excavation needed.

These are the needs as we see them at this time. What are your thoughts on the subject?

Mike
M. E. Whelan

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